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SUBJECT: Forwards Rev 1 to Inservice Insp Relief Request ISI-2-007 re visual insp of snubbers.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352

January 31, 1991
G02-91-019

Docket No. 50-397

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Subject: NUCLEAR PLANT NO. 2, OPERATING LICENSE NPF-21
INSERVICE INSPECTION PROGRAM PLAN
REQUEST FOR RELIEF ISI-2-007

- Reference: 1) Letter, G02-85-274, GC Sorensen (SS) to WR Butler (NRC),
"Inservice Inspection Program Plan Requests for Relief",
dated 5/28/85
- 2) Letter, EG Adensam (NRC) to GC Sorensen (SS), "Safety
Evaluation for 1st Ten-Year Interval Inspection Program
and Requests for Relief from Certain Requirements",
dated 3/27/87
- 3) Letter, G02-90-09, GC Sorensen (SS) to NRC, "Request for
Amendment to Technical Specification 3/4.7.4 (Snubbers)
as Recommended by Generic Letter 90-09", dated 1/18/91

In accordance with the Code of Federal Regulations, Title 10, Part 50.55a(g)(5), the Supply System hereby submits a request for revision to Inservice Inspection Relief Request ISI-2-007 which was requested by the Supply System in Reference 1 and approved by the Commission in its entirety in Reference 2. The Supply System currently has before the Commission a request to modify Technical Specification 3/4.7.4 (Reference 3) to implement the recommendations contained in Generic Letter 90-09. Request for revision to Relief ISI-2-007 is necessary because the Technical Specifications, ASME Section XI and Relief ISI-2-007 all contain requirements for visual inspection of snubbers. The visual inspection requirements of Relief ISI-2-007 go beyond the requirements of Generic Letter 90-09 and Section XI. This request for revision removes references to visual inspections from ISI-2-007 so the Technical Specifications and Section XI are the controlling documents for this activity, thereby eliminating any conflicting requirements.

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INSERVICE INSPECTION PROGRAM PLAN
REQUEST FOR RELIEF ISI-2-007

Revision to Relief ISI-2-007 is being requested so that the only remaining item being addressed is the testing requirements of ASME Section XI. The Visual Examination program at WNP-2 is in compliance with ASME Section XI and hence, relief is neither required nor requested. The visual inspections required by Technical Specification 3/4.7.4 are done in addition to the visual examinations required by ASME Section XI. Also note that the testing requirements of Technical Specification 3/4.7.4 are not changed by the recent submittal (Reference 3), and therefore the bases for the NRC's granting of the original relief for ISI-2-007 should still be valid.


In addition to the removal of the reference to visual inspection in ISI-2-007 as requested in Reference 1 the following changes are also included:

- The number of snubbers is changed to 620; 535 number in our Reference 1 indicated number of snubber locations having one or more snubbers per location.
- The testing plan is revised to also mention the 37 sample plan.
- An equal or greater level of quality and safety is mentioned.

This revision to relief request ISI-2-007 is considered administrative, and is being submitted to ensure the ISI Program is in compliance with 10 CFR 50.55a(g).

It is requested that the Staff approve this request no later than the commencement of the next refueling outage tentatively scheduled for April 13, 1991.

Very truly yours,


G. C. Sorensen, Manager
Regulatory Programs

RR/bk

cc: JB Martin - NRC RV
NS Reynolds - Winston & Strawn
PL Eng - NRC
DL Williams - BPA/399
NRC Site Inspector - 901A

Date 1/31/91

Revision 1

REQUEST FOR RELIEF NO. ISI-2-007

Component
or System

All ASME Class 1, 2 and 3 snubbers.

Code

Section XI 1980 Edition with Addenda through Winter 1980.

Number of
Snubbers

These snubbers are identified on Table 6.2 of ISI Program Plan. Total number of snubbers is currently 620. This number has been decreasing with the implementation of the WNP-2 snubber optimization program.

Section XI
Requirements

The referenced Code requires all non-exempt snubbers to be functionally tested in accordance with the requirements contained in Subsection IWF.

Basis for
Requesting
Relief

The WNP-2 Technical Specification 3/4.7.4 includes requirements for testing of safety related snubbers. The testing requirements are similar and more restrictive than the IWF requirements.

The testing requirements of Section XI are less stringent in that Section XI requires 10% of the snubbers to be tested each 40 months whereas the Technical Specification requires testing of snubbers using either the 10% plan or 37 sample plan each 18 months or refueling outage.

Alternate
Examinations

Testing per WNP-2 Technical Specification 3/4.7.4

Impact on
Plant Quality
and Safety

None. It is the Supply System's position that testing of snubbers in accordance with the WNP-2 Technical Specifications provides an equal or greater level of plant quality and safety.

